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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

HARRY LEMASTER and CAROLYN
 LEMASTER,

Plaintiffs,

vs.

ALLIS-CHALMERS CORPORATION
 PRODUCT LIABILITY TRUST, et al.,

Defendants.

No. C08-3316 PJH

DECLARATION OF RICHARD M.
 GRANT IN SUPPORT OF MOTION TO
 REMAND CASE TO CALIFORNIA
 SUPERIOR COURT

Date: September 17, 2008
 Time: 9:00 a.m.
 Dept: 3, 17th Floor

I, RICHARD M. GRANT, declare:

1. I am an attorney at law duly licensed to practice before the courts of the State of California and am a member of the firm of Brayton♦Purcell LLP, attorneys of record for plaintiff herein. I have personal knowledge of the following facts and, if called upon to do so, could and would competently testify thereto.

2. Plaintiffs Harry LeMaster and Carolyn LeMaster filed their complaint in the California Superior Court, County of San Francisco on May 21, 2008. (Exhibit A to Notice of Removal.)

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1 3. Plaintiffs' complaint alleged exposure to asbestos and asbestos containing products at
2 U.S. Naval shipyards and aboard Navy ships while plaintiff was employed by the United States
3 Navy and the United States Department of Defense.

4 4. Defendant Reliance Electric Company filed its Notice of Removal on July 9, 2008.

5 5. In support of its Notice, defendant filed the Declaration of Thomas McCaffery.

6 6. McCaffery's declaration refers to various "military specifications", "standards" and
7 "requirements".

8 7. Defendant did not submit any non-testimonial evidence. Defendant provided no
9 military specifications, regulations or other exhibits.

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed this 7th day of August, 2008 at Novato, California.

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14 RICHARD M. GRANT